

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
CLAUDIO NAVARRO ZAVALA,
Individually and on behalf of other similarly situated,

Case No: 1:18-CV-01382 (ER)

Plaintiff,

-against-

**TRECE CORP. (d/b/a TRECE MEXICAN RESTAURANT),
54 EAST ENTERTAINMENT INC. (d/b/a Trece Mexican
Restaurant), 54 EAST ENTERTAINMENT MGT INC.
(d/b/a Trece Mexican Restaurant), AESOOK CHOI and
JOEL LIM,**

Defendants.

-----X

STIPULATION AND ORDER OF SUBSTITUTION OF COUNSEL

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned and pursuant to Local Civil Rule 1.4, that the law firm of Morrison Tenenbaum PLLC is substituted in place of the Law Offices of T. Stephen Song, P.C. and the law firm of Kim & Bae, P.C. as counsel of record for the defendants in the above-captioned action. A supporting affidavit is attached hereto pursuant to Local Civil Rule 1.4.

PLEASE TAKE NOTICE that all pleadings, notices of hearing and other filings in this matter should be served upon the following incoming counsel:

**Lawrence F. Morrison, Esq.
MORRISON-TENENBAUM PLLC
87 Walker Street, Fl. 2
New York, NY 10013
Tel.: 212-620-0938
Fax: 646-998-1972
lmorrison@m-t-law.com**

[Signature page follows]

Dated: December 19, 2018

Law Offices of T. Stephen Song, P.C

By: 

Farzad Ramin, Esq.

154-08 Northern Blvd, 2G

Flushing, NY 11354

Tel: (718) 321-0770

*Outgoing Attorneys for
Defendants*

MORRISON-TENENBAUM PLLC

By: 

Lawrence F. Morrison, Esq.

87 Walker Street, Fl. 2

New York, New York 10013

Tel: (212) 620-0938

*Incoming Attorneys for
Defendants*

SO ORDERED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
CLAUDIO NAVARRO ZAVALA,
Individually and on behalf of other similarly situated,

Case No: 1:18-CV-01382 (ER)

Plaintiff,

-against-

**TRECE CORP. (d/b/a TRECE MEXICAN RESTAURANT),
54 EAST ENTERTAINMENT INC. (d/b/a Trece Mexican
Restaurant), 54 EAST ENTERTAINMENT MGT INC.
(d/b/a Trece Mexican Restaurant), AESOOK CHOI and
JOEL LIM,**

Defendants.

-----X
DECLARATION PURSUANT TO LOCAL CIVIL RULE 1.4

Lawrence Morrison declares as follows:

1. I am an attorney admitted to practice before the courts of the State of New York and the United States District Court of the Southern District of New York. I am a partner with the law firm Morrison Tenenbaum PLLC. (“MTLAW”).
2. I respectfully submit this declaration, pursuant to Local Civil Rule 1.4 of the United States District Courts for the Southern and Eastern Districts of New York, in support of the stipulation and order substituting Morrison-Tenenbaum for the Law offices of Stephen Song, P.C. (“T. Song”) and Kim & Bae P.C. (“K&B”) as counsel of record for TRECE CORP. (d/b/a TRECE MEXICAN RESTAURANT), 54 EAST ENTERTAINMENT INC. (d/b/a Trece Mexican Restaurant), 54 EAST ENTERTAINMENT MGT INC. (d/b/a Trece Mexican Restaurant), AESOOK CHOI and JOEL LIM, the defendants in the above-captioned action (collectively “Trece”).

3. Trece requested that MTLAW represent them in this action and have consented to the withdrawal of T. Song and K&B.

4. I respectfully submit that the substitution of counsel will not unnecessarily delay this action or prejudice any party, and therefore respectfully request that the Court approve the Stipulation and Order of Substitution of Counsel submitted herewith.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
December 11, 2018

MORRISON TENENBAUM PLLC

By: 

Lawrence Morrison, Esq.
87 Walker Street, Second Floor
New York, NY 10013
Tel.: (212) 620-0938
Incoming Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CLAUDIO NAVARRO ZAVALA.

Individually and on behalf of other similarly situated.

Plaintiff.

Case No: 1:18-CV-01382 (ER)

-against-

TRECE CORP. (d b a TRECE MEXICAN RESTAURANT),
54 EAST ENTERTAINMENT INC. (d b a Trece Mexican
Restaurant), 54 EAST ENTERTAINMENT MGT INC.
(d b a Trece Mexican Restaurant). AESOOK CHOI and
JOEL LIM,

Defendants.
_____X

AFFIDAVIT PURSUANT TO LOCAL CIVIL RULE 1.4

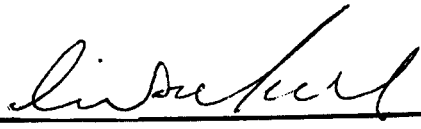
Joel Lim declares as follows:

1. I am an individual defendant and a principal of Trece Corp., defendant in the above-captioned matter, and as such am fully familiar with the statements contained herein.
2. I respectfully submit this affidavit, pursuant to Local Civil Rule 1.4 of the United States District Courts for the Southern and Eastern Districts of New York, in support of the stipulation and order substituting Morrison Tenenbaum PLLC ("MTLAW") for the Law Offices of T. Stephen Song, P.C. ("T. Song") and Kim & Bae P.C. ("K&B"), as counsel of record for Trece Corp.
3. I have requested that MTLAW represent Trece Corp. and I have consented to the withdrawal of T. Song and K&B.
4. I respectfully submit that the substitution of counsel will not unnecessarily delay this action or prejudice any party, and therefore respectfully request that the Court approve the Stipulation and Order of Substitution of Counsel submitted herewith.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true
and correct

Dated: New York, New York
December 11, 2018

Trece Corp.

By: 
Name: JOEL LIM
Title: General Manager

Sworn to before me this 11th day of
December 2018


Notary Public

LAWRENCE F. MORRISON
Notary Public, State of New York
Registration #02MO6059654
Qualified In New York County
Commission Expires July 28, 2019